

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ST. MATTHEW'S UNIVERSITY
(CAYMAN) LTD., a Cayman Islands company,

Plaintiff,

vs.

SABA UNIVERSITY SCHOOL OF
MEDICINE FOUNDATION, a Netherland-
Antilles company; MEDICAL UNIVERSITY
OF THE AMERICAS, a St. Kitts & Nevis
company; EDUCATION INFORMATION
CONSULTANTS, INC., a Massachusetts
corporation; EDUCATIONAL INTERNATIONAL
CONSULTANTS, LLC, a Massachusetts
limited liability company; PATRICIA L. HOUGH,
M.D. an individual, and d.b.a. "Saba University
School of Medicine"; DAVID L. FREDRICK, an
individual; PANKAJ DESAI, M.D., an individual;
ASSOCIATION OF AMERICAN
INTERNATIONAL MEDICAL GRADUATES,
INC., a Nevada corporation, a.k.a.
"aaimg@yahoo.com"; THOMAS MOORE, M.D.
a.k.a. "presaaimg@hotmail.com" and
"crocdoc2004@netzero.net," an individual;
SARAH B. WEINSTEIN a.k.a.
"execsecaaimg@hotmail.com," an individual;
RACHAEL E. SILVER, an individual; and
DIEDRE MOORE, an individual,

Defendants.

Case No.: CV-S-05-0848-RCJ(LRL)

AFFIDAVIT OF VINCENT F. O'ROURKE, JR.

I, Vincent F. O'Rourke, Jr., being sworn under oath depose and state as follows:

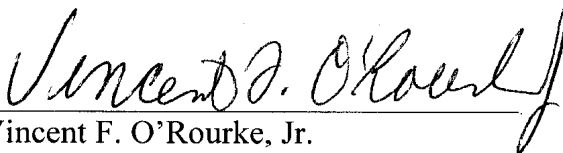
1. I am an attorney licensed to practice in the Commonwealth of Massachusetts.
2. I represent the defendant Pankaj Desai in this matter.

3. Attached hereto as Exhibit A are true and accurate copies of pages which appeared on the website of plaintiff, St. Matthew's University on March 10, 2006.

4. This attachment describes the Concurrent Degree Program maintained between St. Joseph's College of Maine and St. Matthew's University.

5. The fourth page of the attachment advises "You complete fourth and fifth semesters of your St. Matthew's MD program in Maine, a state known for its hospitality, recreation and breathtaking beauty during all four seasons. And you can easily have your family living with you while completing your coursework in Maine."

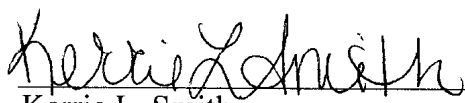
Signed under the pains and penalties of perjury this 30 day of March, 2006.


Vincent F. O'Rourke, Jr.

COMMONWEALTH OF MASSACHUSETTS

Worcester, ss.

On this 30th day of March 2006, before me, the undersigned notary public, personally appeared Vincent F. O'Rourke, Jr., proved to me through satisfactory evidence of identification, which was ☐ photographic identification with signature issued by a federal or state governmental agency, ☐ oath or affirmation of a credible witness, ☒ personal knowledge of the undersigned, to be the person whose name is signed on the preceding or attached document(s), and acknowledged to me that he signed it voluntarily for its stated purpose.

 (official seal)
Kerrie L. Smith Notary Public
My commission expires: January 18, 2013